

Erik F. Stidham (Idaho Bar No. 5483) (Admitted pro hac vice)
Robert A. Faucher (Idaho Bar No. 4745) (Admitted pro hac vice)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
efstidham@hollandhart.com
rfaucher@hollandhart.com

Darren G. Reid (11163)
Engels Tejeda (11427)
Benjamin D. Passey (19234)
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
Telephone: (801) 799-5800
dgreid@hollandhart.com
ejtejeda@hollandhart.com
bdpassey@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY,	Chapter 7
Debtor.	Honorable William T. Thurman

**THE ST. LUKE'S PARTIES' MOTION PURSUANT TO FED. R. BANKR. PRO. 2004
FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND PRODUCTION OF
DOCUMENTS BY, DONO-CUSTOS, INC. WITHOUT PRIOR NOTICE OR
HEARING PURSUANT TO LOCAL RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP (together "St. Luke's Creditors"), submit this motion for relief against non-debtor Dono-Custos, Inc. under Bankruptcy Rule 2004 and Local Rule 2004-1 as follows.

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy (the "Debtor"). The Debtor committed intentional torts against the St. Luke's Creditors and they obtained a judgment in Idaho in excess of \$50 million against Debtor. As of July 17, 2024 (the "Petition Date"), the Debtor's judgment liability remained in excess of \$50 million.

2. On August 14, 2024, the Chapter 7 Trustee appointed in this case conducted a meeting of creditors under 11 U.S.C. § 341 (the "341 Meeting") during which the Debtor gave incomplete or deficient responses about his assets and pre-petition transfers of the same.

3. Thereafter, the Trustee received communications and obtained information from public records indicating that the Debtor likely has or had interests in business entities and assets that have not been disclosed or were transferred pre-petition. *See e.g.*, Trustee's Motion for Order Authorizing 2004 Exam (the "Trustee's Motion"), Dkt. 47, ¶¶ 5-6.

4. The St. Luke's Creditors similarly have come across information suggesting that the Debtor concealed assets by transferring them to one or more entities he controls indirectly or directly, including Dono-Custos, Inc.

5. The St. Luke's Creditors wish to conduct an examination of Dono-Custos, Inc. to discover whether Debtor used Dono-Custos, Inc. to save, conceal and transfer funds that belonged to him.

6. Under Bankruptcy Rule 2004, this Court can empower the St. Luke's Creditors to take discovery from Dono-Custos, Inc. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

7. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of Dono-Custos, Inc. and compel production of documents from Dono-Custos, Inc.

8. The St. Luke's Creditors will give Dono-Custos, Inc. no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A).

9. Moreover the St. Luke's Creditors will compel Dono-Custos, Inc.'s attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 10th day of December, 2024.

/s/ Erik F. Stidham

Erik F. Stidham (Idaho Bar No. 5483)
Robert A. Faucher (Idaho Bar No. 4745)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
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rfaucher@hollandhart.com

/s/ Engels Tejeda

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Tracy Jungman, NP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of December, 2024, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com

U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

/s/ Erik F. Stidham
Erik F. Stidham
of Holland & Hart LLP